



DEPARTMENT OF THE ARMY  
PINE BLUFF ARSENAL  
PINE BLUFF, ARKANSAS 71611

AR00710

*JH* 7/27/82

SARPB-ETT

18 June 1982

SUBJECT: First Quarter FY 82 Groundwater Monitoring Results from PBA

Arkansas Department of Pollution Control and Ecology  
ATTN: Dr. Robert Blantz  
80001 National Drive  
Little Rock, Arkansas 72209

9833802



1. References:

a. Letter to Arkansas Department of Pollution Control and Ecology, 5 April 1982 from SARPB-ETT, PBA.

b. Letter to PBA, 30 April 1982, from Arkansas Department of Pollution Control and Ecology.

2. First quarter FY 82 groundwater monitoring results for PBA are provided (Incl 1) in accordance with 40CFR 265.94 (a) (2) (i) for both active and inactive facilities.

3. Based on information provided in reference 1a (Incl 2) and reference 1b (Incl 3), PBA does not now have any active hazardous waste facilities currently in operation, due to classification changes published in the Federal Register regarding mixed waste.

4. PBA has a large number of inactive waste sites however, and DARCOM Headquarters (MAJ Borkowski) requested that both the State and Federal EPA be approached to discuss delisting of these facilities from RCRA to super fund. Both the State and Federal EPA deferred a decision on this, pending Federal EPA (Region VI) receiving further instructions from EPA Headquarters.

A meeting is currently scheduled with the State of Arkansas/EPA during the third week in July 1982 to further discuss the PBA data.

5. For further information contact the Environmental Coordinator, Mr. Thomas E. Shook, (501) 541-3572.

FOR THE COMMANDER:

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*Joe G. Janski*  
JOE G. JANSKI, PE

Director, Engineering and Technology

*Pine Bluff Arsenal*  
*ACD 125 1220 701*

SARPB-ETT

Mr. Shook/bb/3572 -  
5 April 1982

Arkansas Department of Pollution Control and Ecology  
ATTN: Dr. Robert Blantz  
80001 National Drive  
Little Rock, Arkansas 72209

Dear Dr. Blantz:

This letter is written to clarify our understanding of how recent regulatory changes in RCRA have affected Pine Bluff Arsenal (PBA) as a hazardous waste facility and to request guidance from ADPC&E on disposal of chemical wastes in light of the regulatory changes.

As background, PBA submitted its Part A application on November 14, 1980. The Part A application listed 22 separate hazardous wastes. However, not all the 22 wastes listed were wastes which were being generated by PBA as of November 19, 1980. Rather, most of the wastes identified were wastes which Pine Bluff Arsenal could be expected to generate if we were required to initiate a full complement of munitions production in accordance with our mobilization mission (in the event of war or other national emergency).

An accurate picture of our actual RCRA waste generation is in the annual report we submitted to ADPC&E on February 26, 1982 (Inclosure 1). The report indicates 216,154 pounds of incinerator cluster ash (D000/D006), 6,930 pounds of incinerator cluster sludge (K044) and 730,000 gallons of industrial sludge from surface impoundments (K044). Thermal treatment ash from the WP pollution abatement facility was also listed but is not applicable because that facility is not presently in operation.

Under Section 261 of the RCRA regs (Subpart C), there is no code "D000". However there is a general code for all heavy metals which your inspectors advised us to use. You will therefore find no "D000" listed on our November 14, 1980, Part A interim status application. Likewise, you will find no "D006" (cadmium) listed on our November 14, 1980, Part A form. This is because at the time of our November 14 Part A application we had no firm data to verify the actual presence of cadmium in incinerator cluster ash. Cadmium traces in the incinerator ash have since been verified. However, in the aggregate, the concentrations of the total waste mixture do not exceed levels which would cause such wastes to fail the EP Toxicity test and the D000 and D006 listings on the annual report are for informational purposes.

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Insofar as the regulatory changes, the EPA on November 17, 1981, (46 FR 56588) modified the Sec. 261.3 definition of hazardous waste in a manner which affects Pine Bluff Arsenal's listed hazardous wastes.

Exempted from the definition of hazardous waste, and hence from RCRA coverage, were several wastes, which had been listed as hazardous waste by EPA solely because they exhibited one of the characteristics of hazardous waste in Subpart C, Section 261. These were F003 (certain spent non-halogenated solvents), K044, K045 and K047 (certain residues from explosives manufacture) and certain discarded chemicals identified by name as either acutely hazardous or hazardous. As originally promulgated the regulations required that any mixtures of any of these wastes and other solid wastes were presumptively hazardous by application of the mixture rule. EPA, in its November 17, 1981, amendments determined that such a result was inappropriate, as the mixture can be tested to determine whether it exhibits the characteristics of hazardous waste.

A major portion of PBA's present hazardous waste generation is K044. It therefore appears that the incinerator cluster sludge and industrial sludge from the surface impoundments are no longer subject to RCRA requirements unless the mixture tests out as hazardous. Testing by PBA verifies that these wastes do not meet the criteria for treatment as a hazardous waste as in the aggregate they do not fail the EP Toxicity test and are not ignitable, reactive or corrosive.

It further appears that the EPA (at 46 FR 56586, November 17, 1981) excluded from the mixture rule wastewater mixtures that are hazardous waste solely because they contain discarded commercial chemical products or manufacturing chemical intermediates listed in Sec. 261.33 arising from de minimis losses in the normal handling of these materials such as minor spills or leakage during normal material handling, minor leaks from pipes, process equipment, storage tanks or rinsates from drained or empty containers. In our case this would involve U131 (Hexachloroethane) and perhaps other chemical products listed in the P and U series of Sec. 261.33.

Please advise us if our interpretation is in accordance with your interpretation of the above-described regulatory changes. With regard to the K044 wastes, please advise us if ADPC&E will require any additional tests to verify that our K044 waste mixture is non-hazardous.

As it appears that the wastes are no longer subject to RCRA disposal requirements (i.e., it is no longer necessary to dispose of the K044 wastes in a hazardous waste landfill and the D000/D006 incinerator ash wastes do not fail the EP Toxicity Test), the question arises as to whether or not these wastes can be disposed of in a sanitary landfill. It should be noted that during the survey of historic dump sites containing similar mixed waste, but which had been subjected to rainfall and

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percolation for many years, failed the EP Toxicity test and required that monitoring wells be installed prior to November 19, 1981. This identifies both a technical and legal problem. Not all dump sites, however, exhibited this property. The historic dump sites were not sited or constructed in accordance with more modern criteria currently listed in the State Solid Waste Disposal Code. The modern siting criteria used in current sanitary landfills may or may not be adequate to safely dispose of our waste chemicals which are no longer subject to RCRA requirements.

The State Solid Waste Disposal Code requires written approval from ADPC&E before chemical wastes can be disposed of in a sanitary landfill. This letter is also to request approval to dispose of such wastes in our sanitary landfill subject to such special provisions as the Department may require depending upon our local conditions. If approval cannot be given, we request specific guidance on how we should dispose of these wastes.

We look forward to meeting and working with your personnel in an effort to resolve how Pine Bluff Arsenal can safely dispose of these wastes consistent with the principles and policies of state and federal environmental law and regulation.

For additional information, the point-of-contact for this installation is Mr. Thomas E. Shook, Environmental Coordinator, (501) 541-3572.

Sincerely,



JOE G. JANSKI, PE  
Director, Engineering and Technology

1 Incl



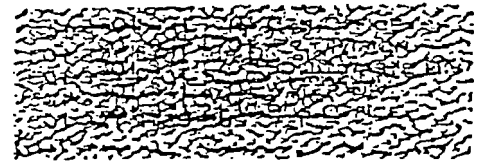
STATE OF ARKANSAS

DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE  
LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7411

April 30, 1982



Joe G. Janski, P.E.  
Director, Engineering and Technology  
Pine Bluff Arsenal  
Pine Bluff, AR 71611

Dear Mr. Janski:

On 7 April 1982, this Department received your letter setting forth some background data and information pertaining to hazardous wastes generated at the Pine Bluff Arsenal. Included in the letter was your interpretation of some recent regulatory changes to the federal regulations concerning the mixture rule as it applies to your wastes.

Your interpretation of the November 17, 1981 regulatory changes appears to be in agreement with our interpretation. Wastes listed solely because of a characteristic can be mixed with a solid waste and become non-hazardous provided the resultant mixture does not meet one or more of the characteristics of ignitability, corrosivity, reactivity, or EP toxicity. This rule currently applies to listed wastes F003, K044, K045 and K047. With respect to your K044 wastes, this Department will not require any additional tests to determine that the waste is non-hazardous.

However, the disposal of these wastes, along with your D000/D006 wastes may pose some site-specific problems. Based on your information and data currently on file, it is evident that, over a period of time, the hazardous constituents of these wastes, previously buried, have been known to migrate from landfills and that the leachate has failed the EP toxicity test. Since this situation has historically occurred it would not be possible for the Department to grant a Section 6(f)(8) waiver for the disposal of these materials into a permitted sanitary landfill which is not specifically designed to adequately contain such waste.

It appears that you are left with only a few options for disposal of subject wastes. Among these are identifying facilities in or out of state where the wastes can be shipped for recycling and/or disposal.

Incl 3

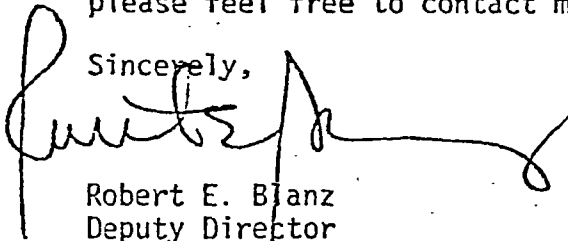
Mr. Joe G. Jans  
April 30, 1982  
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Another alternative is to up-grade your existing sanitary landfill or construct a new one in a more suitable area of the Arsenal to more closely meet the stringent criteria and standards of a RCRA landfill. Such a landfill would most probably insure an environmentally sound and secure method of on-site disposal of these wastes. However, before such a decision is made, it is suggested that a comprehensive engineering study be made as to its feasibility.

I hope that the above answers your questions concerning these wastes.

If you have any further questions or need additional information, please feel free to contact me.

Sincerely,



Robert E. Blanz  
Deputy Director

REB:vs